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February 23, 2024

Via ECF and Email

Hon. Analisa Torres, United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street, New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: *Angulo, et al. v. Clowns.com, Inc., et al.*, No. 23-cv-10983 (AT)
REQUEST FOR EXTENSION OF TIME TO PROCEED TO MEDIATION

Dear Judge Torres,

My office represents Plaintiffs Brayan Angulo, Cameron Pille, Janina Salorio, and Xander Black, and opt-in Plaintiffs Miles Sullivan, Cara Stofa, Yasmine Elabd, Matthew Tierney, Will Pierson, Lia Hauser, Grayson Hampshire, and Isabella Marinucci in the above-referenced matter. We submit this letter jointly with counsel for Defendants to advise the Court that the parties have selected a private mediator and scheduled mediation for April 1, 2024.

In light of the pending mediation, the parties have agreed that a short extension of all current deadlines would be appropriate here. Such an extension would allow the parties to focus their resources on the upcoming mediation, including by giving Defendants the time to collect the information and data needed by Plaintiffs in order to prepare for the mediation, and to prepare mediation briefs for the mediator. An extension would foster the parties' efforts to resolve this case by avoiding the need for motion practice before then. Accordingly, pursuant to this Court's Individual Practices ¶ I(C), the parties hereby request a reasonable extension of all current deadlines as follows:

Deadline	Current Date	Proposed Date
Defendants' Answer/Response/Motion re: Complaint	02/26/2024	04/15/2024
Initial Disclosures	03/06/2024	04/24/2024
All Fact Discovery	06/19/2024	08/07/2024
Initial Requests for Production of Documents to be Served	04/5/2024	05/24/2024
Interrogatories to be Served	04/5/2024	05/24/2024
Depositions to be Completed	06/19/2024	08/07/2024
Requests to Admit to be Served	05/15/2024	07/03/2024
All Expert Discovery	08/03/2024	09/21/2024

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The parties have already been directed to report to the Court by April 6, 2024, on the outcome of the mediation, and there is accordingly no need to alter that deadline.

This is the first request to extend these deadlines, except that the parties previously stipulated to an extension of Defendants' time to answer or respond to the Complaint.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Hugh Baran', with a stylized flourish extending to the right.

Hugh Baran
Counsel for Plaintiffs

cc: All counsel by ECF